



## State of Vermont

Department of Fish and Wildlife  
Department of Forests, Parks and Recreation  
Department of Environmental Conservation  
State Geologist  
RELAY SERVICE FOR THE HEARING IMPAIRED  
1-800-253-0191 TDD>Voice  
1-800-253-0195 Voice>TDD

AGENCY OF NATURAL RESOURCES  
Department of Environmental Conservation  
Waste Management Division  
103 South Main Street / West Building  
Waterbury, Vermont 05671-0404  
802-241-3886  
Fax 802-241-3296

September 10, 1998

MR TIM ROBERTSON  
ELLIS ROBERTSON COMPANY  
KEENE NH 03431

Re: Sites Management Activity Completed (SMAC) at the Roundtree Ford  
Brattleboro, Vermont (Site #98-2382)

Dear Mr. Robertson:

The Sites Management Section (SMS) has reviewed the following submittals related to subsurface contamination at the referenced site:

- Response Action Report dated May 29, 1998, by Clough, Harbour, and Associates (CHA);
- Site Assessment report dated June 30, 1998, and Underground Storage Tank (UST) closure form prepared by Aaron and Sons dated June 30, 1998;
- Analytical Results dated July 13, 1998, for composite samples from the former pit of the 1,000-gallon waste oil UST; and
- Supplemental information from CHA dated September 9, 1998

Based on this information, the SMS has the following understanding about the site:

- On April 8, 1998, soil contaminated with petroleum was found during the excavation of a trench for a concrete footing. Further excavation suggested that the contamination was likely a leaching bed for the floor drains within the existing building.
- From the footing trench, soil and wastewater samples were collected and analyzed for the following:
  - Volatile Organic Compounds (VOCs) using EPA Method 8260
  - Semivolatile Organic Compounds (SVOCs) using EPA Method 8270
  - Total RCRA Metals using EPA Methods 200.7 and 245.1
  - Polychlorinated Biphenyls (PCBs) by Modified EPA Methods 8021/8015/8240
  - Volatile Petroleum Hydrocarbons (VPH) using EPA Methods 8021/8015/8240
  - Total Petroleum Hydrocarbons (TPH) using Modified EPA Method 8100

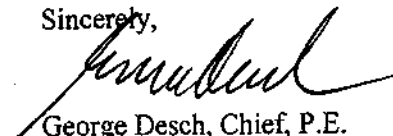
The soil sample contained elevated levels of petroleum compounds. The total TPH of the sample was 14,660 mg/kg. Concentrations of barium, chromium, and lead in the sample were 42.6 mg/kg, 22.9 mg/kg, and 35 mg/kg, respectively. No PCBs were detected above the detection limits of 0.25 mg/kg. The waste water contained TPH concentrations of 326 mg/l. No chlorinated compounds were detected in the soil or waste water sample.

(Over)

- On April 29, 1998, excavation took place to remove the contaminated soil. Approximately 80 tons of material were removed, which included gravel leaching material and the concrete dry-well structure. Approximately 2,500-gallons of wastewater within the leaching material was removed with a vacuum truck. Once this material was removed, no PID levels above background were detected in the sidewalls or bottom of the excavation. Also, no groundwater was found in the excavation after the leaching material was removed. Two soil samples were collected from the excavation for laboratory analysis: one composite sample (S-1) from the sidewalls and one (S-2) from the bottom. No TPH concentrations above the detection limits of 50 ppm were found in the samples. Also, no VOCs above detection limits were found. These results suggest that the contaminated soils associated with the leaching bed and floor drains were removed. The excavated area was filled with clean soil. Based on a receipt for the soils dated June 11, 1998, the contaminated soil and material were disposed at the Casella Landfill in Bow, New Hampshire.
- The discharge pipe from the floor drain to the dry wells was cut where it exited the building. At the pipe outlet from the building, absorbent pads were placed in the pipe before being plugged with a quick setting hydraulic cement. Within the building, the pipe inlet was also plugged with a hydraulic cement. According to Water Supply/Wastewater Disposal Permit (WW-2-1085), the floor drains within the building can be connected to the municipal sewage collection system, provided that conditions of the permit are met. In a CHA letter dated September 3, 1998, to the Department of Environmental Conservation (DEC) regional engineer, CHA stated that the completed connection of the floor drain to the municipal system satisfies the permit conditions. The construction of the connection included installing a sand/oil separator.
- On June 25, 1998, a 1,000-gallon waste oil UST was removed. Depth of excavation was six feet. No groundwater was found. About 4 cubic yards of soil had elevated PID readings, with 25 ppm as the highest level. These soils were placed in sixteen 55-gallon drums. After reviewing the analytical results of a soil sample from the 4 cubic yards, Connecticut Waste Oil, Inc. removed the drums from the site. This removal was documented on the Bill of Lading dated July 22, 1998.
- Soil samples were collected from the trench sidewall and trench bottom for laboratory analysis. No VOCs and Semi-VOCs were detected above detection limits. Arsenic, chromium, and lead were detected in the samples. However, the metal levels from the sidewall and the bottom were at levels below the EPA Region III Risk-Based Concentrations (RBC) for ingestion of soil. The trench was filled with clean soil.

Based on the above, the SMS believes that the residual contamination at the site does not pose an unreasonable risk to human health and safety or the environment. Therefore, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release Ellis Robertson Company, Inc. and Roundtree Ford of any past or future liability associated with the contamination found at the site. It does, however, mean that the SMS is not requesting any additional work at this time. If you have any questions or comments, please contact me at (802) 241-3888.

Sincerely,

  
George Desch, Chief, P.E.  
Sites Management Section

cc: DEC Regional Office  
Brattleboro Selectboard  
Ben Rice, Clough, Harbor, and Associates  
jss/wp/sites/972164/tms1.smc



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switchboard (802) 241-3888  
facsimile (802) 241-3296

# FACSIMILE

Date: 9/15/98  
Pages: 3 (including cover page)

### PLEASE DELIVER ACCOMPANYING MATERIAL TO:

Name: Ben Rice  
Fax #: \_\_\_\_\_

### COMMENTS:

Here is the smac letter. If you have any questions, call me  
at 802 241-3886

From: John Schmelzer  
Phone#: \_\_\_\_\_